

# **EXHIBIT 3**

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Enterprises LLC and Authentic Brands Group LLC*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

MICHAEL GAFFNEY,

Plaintiff,

-against-

MUHAMMAD ALI ENTERPRISES LLC, et al.,

Defendants.

Case No. 1:18-cv-08770-GBD-OTW

**DEFENDANTS MUHAMMAD ALI  
ENTERPRISES LLC AND AUTHENTIC  
BRANDS GROUP LLC'S  
SUPPLEMENTAL RESPONSES AND  
OBJECTIONS TO PLAINTIFF'S  
REQUESTS FOR PRODUCTION OF  
DOCUMENTS DATED MAY 4, 2020**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Defendants Muhammad Ali Enterprises LLC ("MAE") and Authentic Brands Group LLC ("ABG") (collectively, "Defendants") provide the following Supplemental Responses and Objections to Plaintiff Michael Gaffney's ("Gaffney") Requests for Production of Documents dated May 4, 2020:

**RESERVATION OF RIGHTS**

A. Defendants specifically reserve the right to reassert said objections on motion or at the time of trial.

B. Defendants' objections are made without in any way waiving or intending to waive, but, on the contrary, intending to preserve and preserving:

a. All objections as to the competency, authenticity, relevancy, materiality,

Defendants and Mr. Gaffney, as well as all royalty statements and payments made to Mr. Gaffney. Defendants have also already produced copies of all agreements between Defendants and third parties concerning the Photographs. No further non-privileged, responsive documents exist in Defendants' possession, custody or control that are relevant to any party's claim or defense.

**SUPPLEMENTAL RESPONSE:** In accordance with the Court's Order dated September 30, 2020 and the parties' subsequent agreement, Defendants have produced MAE's gross revenues during the period February 1, 2015 through August 2020 on an annual basis broken down by income type (i.e., royalty revenue, other income, and sales of inventory).

**REQUEST NO. 31:**

All Documents sufficient to show MAEs net revenues earned during the Term and after the Term from all sources.

**RESPONSE:** Defendants repeat and incorporate by reference their objections and responses to Request No. 30.

**SUPPLEMENTAL RESPONSE:** Defendants have produced documents sufficient to show MAE's net revenues earned during the period February 1, 2015 through August 2020 on an annual basis.

**REQUEST NO. 32:**

Documents sufficient to show all Linked Websites.

**RESPONSE:** Defendants repeat and incorporate by reference their objections and responses to Request No. 30.

**SUPPLEMENTAL RESPONSE:** In accordance with the Court's Order dated September 30, 2020 and the parties' subsequent agreement, Defendants state that there was no source of revenue to ABG generated from the right to use the Photographs that did not flow through MAE during the period February 1, 2015 to the present.

**REQUEST NO. 40:**

All Documents that MAE and ABG intend to rely on in support of any calculation of damages.

**RESPONSE:** Defendants repeat and incorporate by reference their objections and responses to Request No. 30. Defendants further object to this request on the grounds that it is premature and requests documents protected by the work-product and attorney-client privileges. Defendants will supplement their response to this request with redacted invoices of their costs and attorneys' fees incurred in connection with this action and any required expert disclosures in accordance with the Federal Rules of Civil Procedure, Local Rules and Orders of this Court entered in this action.

Dated: November 17, 2020

Respectfully submitted,

By: /s/Jessica S. Rutherford  
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